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Attorneys for Defendant

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

LINDA PATTERSON,

Plaintiff,

v.

NANCY A. BERRYHILL,  
Acting Commissioner of Social Security,

Defendant.

Case No. 2:18-cv-01951-APG-PAL

**JOINT STIPULATION AND [PROPOSED]  
ORDER FOR EXTENSION OF TIME FOR  
DEFENDANT TO RESPOND TO PLAINTIFF'S  
MOTION FOR REMAND/REVERSAL**

IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that the time for responding to Plaintiff's Opening Brief be extended from April 8, 2019 to **May 15, 2019**. This is Defendant's first request for extension. Good cause exists to grant Defendant's request for extension. Counsel was out of the office on intermittent sick leave for two and half weeks with the flu/pneumonia last month and was also subsequently out due to her chronic migraines, which impair her vision following her illness. Counsel also has over 80+ active social security matters, which require two or more dispositive motions per week until mid-May. Due to heavy caseload and unexpected leave, Counsel needs additional time to adequately review the transcript and properly

1 respond to Plaintiff's Motion for Reversal and/or Remand. The parties further stipulate that the  
2 Court's Scheduling Order shall be modified accordingly. Defendant makes this request in good faith  
3 with no intention to unduly delay the proceedings. Counsel apologizes for the belated request, but  
4 made her request as soon as reasonably practicable, as she has been out on sick leave.

5 Respectfully submitted,

6 Dated: April 4, 2019

7 /s/ Cyrus Safa  
8 (\*as authorized by email on April 4, 2019)  
9 CYRUS SAFA  
10 Attorney for Plaintiff

11 Dated: April 4, 2019

12 NICHOLAS A. TRUTANICH  
13 United States Attorney  
14 DEBORAH LEE STACHEL  
15 Regional Chief Counsel, Region IX  
16 Social Security Administration

17 By /s/ Tina L. Naicker  
18 TINA L. NAICKER  
19 Special Assistant U.S. Attorney  
20 Attorneys for Defendant

21 **ORDER**

22 APPROVED AND SO ORDERED:

23 DATED: April 9, 2019

24 Peggy A. Leen  
25 THE HONORABLE PEGGY A. LEEN  
26 UNITED STATES MAGISTRATE JUDGE

**CERTIFICATE OF SERVICE**

I, TINA L. NAICKER, certify that the following individual was served with a copy of the **JOINT STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME FOR DEFENDANT TO RESPOND TO PLAINTIFF'S MOTION FOR REMAND/REVERSAL** on the date and via the method of service identified below:

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Attorneys for Plaintiff

Respectfully submitted this 4th day of April 2019,

/s/ Tina L. Naicker  
TINA L. NAICKER  
Special Assistant United States Attorney